

FILED APR 3 23 PM 11:41 USDCALB

UNITED STATES DISTRICT COURT

for the

Southern District of Alabama

Division

Officer
Lakeria Monae Montgomery

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Cory Morgan, Mobile County Metro Jail

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

23-cv-104-CG-B

(to be filled in by the Clerk's Office)

Jury Trial: (check one)



Yes



No

SCANNED

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COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Lakeria Montgomery

Street Address

4000 Rv Brown Dr

City and County

Mobile

State and Zip Code

Alabama 36612

Telephone Number

251 358 2019

E-mail Address

Lakeria.Montgomery15@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Cay Morgan
Assistant District Attorney
205 Government St
Mobile
Al 36602
251-574-8400

Defendant No. 2

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Mobile County Metro Jail
450 St Emanuel St
Mobile
Al 36603
251-574-6412

Defendant No. 3

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Defendant No. 4

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

1. violation of my 8th Amendment Rights
2. conspiracy to commit fraud
3. Defamation
4. Harassment / Bullying

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* _____, is a citizen of the
State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____,
and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* _____, is a citizen of
the State of *(name)* _____. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

1. I was terminated for going to be sworn into the United States Navy. After I was given permission to go by my LT in Command, she later "Changed her mind" due to a staff shortage during the day of Feb 9th 2021, which was the morning I was supposed to travel to MEPS. I sent her a notarized excuse from my recruiter (pugh of the US Navy) but she had stated that she'd already made her decision.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

10 million for emotional stress + Anxiety. I had to be rushed to the hospital from working in rough areas. I thought of ways to get out of my situation which took a hard toll on me.
10 million for bills accumulated from loss of income, I lost my car + my credit went down over 100 points throwing me into debt.

80 million for defamation + loss of job opportunities, I was turned down from another CO position after I told them about the Contraband situation. I was questioned + looked at differently after I told them. I was honest but I wasn't accepted due to lies.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

4/3/23

Signature of Plaintiff

Printed Name of Plaintiff

Yakasia Marie Montgomery
Yakasia Marie Montgomery

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Continuance of III Statement of Claim.

I was notified during the weekend that I was to report to MEPS to be sworn into the United States Navy, I asked my LT Wilcox, & she gave me permission but later changed her mind. Because of me not being able to reach my recruiter in time, I decided to send a notarized excuse for my departure & I left the next morning after a phone call from my LT. I was sworn into the US Navy on Feb, 10th, 2021. When I returned, I received a phone call from Internal Affairs. They told me to report & when I did I was served with my termination letter that stated "due to my unfavorable work habits & my reporting late on more than one occasion & the behavior continued after counseling." This was completely false. ~~I can~~ It was later revealed by LT Wilcox to Cassandra Adams (my mother) that I was fired because she was harassed & put under investigation. It was found that she was married & once carried the last name Montgomery so with all of this she was pressured to do what she did.

J. Coy Morgan revealed in an official statement to the Alabama State bar that he ~~affirms~~ ^{affirms} He contacted Det. Bogsby at mobile county metro jail regarding intelligence that he gathered the defendant's sister was allegedly sneaking contraband into the jail under pizza boxes. They investigated & I was subsequently fired. This contraband is

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now being used as evidence in an ongoing trial with Quinterius Williams. This is false I was never arrested + I was never caught with Contraband.
3. During a background check with the FBI at Quantico on a recorded line with Jamie Eogers, she revealed to me that on my record she could see that I was caught with Contraband + she assured me if she could see this then it was real + it was a problem.

4. I was called to shift command by Captain Stallworth of the Metro Jail out of my work area + taken to the Deputy Wardens office where he was very rude + adamant about me going to jail for Contraband. He told me he had evidence against me, when I asked to see it he told me it was for det. Bogby to show me. The Captain + I left + went to det. Bogby where he interviewed me + told me to speak to no one about the events that had taken place. Everyone somehow knew, then I began to be harassed. I was called to shift command on numerous occasions, isolated from my coworkers, put in horrible life threatening situations + bullied by taunts of me going to jail day after day.

#2 continued - Coy Morgan's motive was to use illegal messages from the CellPhone that he got from the victims phone, in Quinterius Williams case. He conspired with the messages to commit fraud.